

**Before The Federal Communications Commission
Comments in GN Docket No. 25-133**

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Comments with reference to the requirement that the programming on certain FM Translator stations must simultaneously be broadcast on an AM station.

AM broadcasting has a long, nearly 100 – year history. During the early years of radio broadcasting, AM stations were the sole source of radio. In the 50's, FM broadcasting was initiated on a limited basis, and for nearly two decades, did not have much traction. This was due to the limitations of the technology of the age, both on the transmitting and radio sides.

In the mid – 70's, FM broadcasting gained traction as advances in technology took hold. The equipment at the radio station became much more practical and less costly, and radio manufacturers began making high performance FM radios at lower cost.

The early FM broadcasts were niche formats such as Classical and Easy Listening, but in the late 70's and early 80's, as more FM stations initiated operation, FM stations began doing mainstream formats such as Country, Top – 40 and Rock. Formerly successful AM stations were crushed by this wave of programming broadcast through the superior FM medium. The decline of listenership to AM radio continues to decline to this day, although by Nielsen Ratings, almost no one is listening to AM radio anymore.

We have arrived at a point where AM station licensees are surrendering their licenses as the land under the tower is more valuable than the entire radio station! I foresee this trend continuing; AM stations discontinuing broadcasting as for various reasons, chiefly very low levels of listenership, continuing to operate the stations is economically unfeasible.

The Commission recognized this trend around 2010, and to assist AM stations who had been providing valuable programming service to the people of their communities, began permitting AM stations to simultaneously broadcast their programming on FM translator stations. The Commission named this initiative “AM Revitalization”. Of course, this excellent initiative did not at all revitalize the AM broadcasting service; in fact it may have actually contributed to the demise of AM broadcasting as programming listeners once were forced to “push the AM button” to hear was now available on FM! But, it DID preserve valuable radio service that had been provided over a long period of time by AM broadcasters. The service provided by these many translators runs deep; from niche, alternative formats in large cities to 24 – hour quality service to many smaller communities.

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Today, there are many broadcasters transmitting on FM translators as their primary service, me included, while also broadcasting (in my case, daytime – only) the programming on AM radio. As essentially no one is listening to these AM stations, operating them is a licensing, cost and maintenance burden that is completely unnecessary. There is also a waste of energy, as AM stations consume significant amounts of electrical power in order to operate.

Therefore, I respectfully propose the Commission eliminate the requirement that those licensees operating FM translators with companion AM stations, be allowed, at their discretion, to have the option to discontinue the operation of those “parent” AM stations, and continue to have the FM translator operating as the primary radio service.

/s/

Don Davis